

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

**REGINA GORAM,** )  
                        )  
**Plaintiff,**       )  
                        )  
v.                     )                      **Civil Action No.**  
                        )  
**MEADOWCRAFT, INC.,** )                      **3:06-cv-323-WKW**  
                        )  
**Defendant.**       )

**DEFENDANT'S UNOPPOSED MOTION**  
**FOR QUALIFIED HIPAA PROTECTIVE ORDER**

COMES NOW Defendant Meadowcraft, Inc. and respectfully moves this Court to enter a Protective Order in compliance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Pursuant to the Court's "Administrative Procedures for Filing, signing, and verifying pleadings and documents in the District Court under the Case Management/Electronic Case Files (CM/ECF) System" Section II(E)(3), a proposed Order in WordPerfect format will be electronically submitted directly to the Court's chambers as an attachment to an email.

The proposed order conforms to the standard ALND Uniform Initial Order Governing All Further Proceedings, and has been agreed upon by the parties.

Respectfully submitted,

s/T. Matthew Miller

T. Matthew Miller  
One of the Attorneys for Meadowcraft, Inc.  
Bradley Arant Rose & White LLP  
One Federal Place  
1819 Fifth Avenue North  
Birmingham, AL 35203-2104  
Telephone: (205) 521-8000  
Facsimile: (205) 521-8800  
Email: mmiller@bradleyarant.com

CERTIFICATE OF SERVICE

I hereby certify that on October 23, 2006, I electronically filed the foregoing with the Clerk of the Court, using the CM/ECF system which will send notification of such filing to the following:

Jon C. Goldfarb, Esquire  
Maury S. Weiner  
Wiggins, Childs, Quinn & Pantazis, LLC  
The Kress Building  
301 19th Street North  
Birmingham, Alabama 35203  
Email: JGoldfarb@wcqp.com

and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

None

Respectfully submitted,

s/ T. Matthew Miller  
T. Matthew Miller  
Bradley Arant Rose & White LLP  
One Federal Place  
1819 Fifth Avenue North  
Birmingham, AL 35203-2119  
Telephone: (205) 521-8000  
Facsimile: (205) 521-8800  
E-mail: mmiller@bradleyarant.com